



Virginia Health Benefit Exchange (HBE) Carrier FAQs

April 28, 2023

Q1. In the January Broker Town Hall document, it references broker training during Summer 2023. Have more defined dates been solidified at this point and can be shared?

Training is expected to open in the Virginia LMS in August 2023. Current FFE-certified agents will be eligible to complete a shorter training program for plan year 2024 along with Virginia-specific modules. Agents new to the Exchange or who are not currently FFE-certified will be required to take the full Virginia Exchange training program for plan year 2024. Agents will continue to be required to be licensed and in good standing through the Virginia Bureau of Insurance.

Q2. What are the estimates of consumers transitioning from Medicaid to SBE coverage?

Looking to confirm how many would be QHP-eligible and detailed breakdown. Federal estimates indicate that approximately one third of individuals determined ineligible for Medicaid may be eligible for QHPs.

Q3. Regarding the following question, can we conclude that VAHBE will NOT require any particular language or the VIM logo for any customer-facing communications?

Correct, the Virginia Exchange will not require particular language or the VIM logo for consumer-facing communications.

Q4. Will VAHBE issue a carrier participation agreement or contract to contracted plans for signature?

If so, when will it be due? Yes, carriers will enter into agreement with the Virginia Exchange this year. We expect agreements to be sent to carriers and returned by 9/15/2023.

<https://www.scc.virginia.gov/getattachment/f855de13-6ae8-4fc1-bc9b-d32ec8644013/planyear.pdf>.

Q5. Some state implementations utilize the AGENT BROKER INFO additional maintenance reason code when a broker is changed. Can this enhancement be added to the Virginia 834 implementation?

Yes, this enhancement will be added to Virginia 834s. When changes are made to the Broker Name, Federal Employer Identification Number (FEIN) in the N1*BO segment and/or National Producer Number (NPN) in the ACT segment, the AGENT BROKER INFO additional maintenance reason will be used in the 2750 loop. We have attached an updated Virginia Configuration Guide to reflect this (Section 2.4).

April 21, 2023

Q1. What will occur to existing brokers who don't complete certification renewal prior to data transfer from FFM?

Agents and brokers may continue to complete certification renewal with the FFM to continue assisting with enrollees in FFM-states. The Virginia Exchange will be offering state-based training and certification to agents licensed in Virginia wishing to assist consumers enroll in Virginia's Insurance Marketplace. A Virginia-specific learning management system will be available in summer 2023. Current FFE-certified agents will be eligible to complete a shorter training program for plan year 2024 along with Virginia-specific modules. Agents new to the Exchange or who are not currently FFE-certified will be required to take the full Virginia Exchange training program for plan year 2024. Agents will continue to be required to be licensed and in good standing through the Virginia Bureau of Insurance. Agents who do not complete the Virginia certification will not have access to Virginia's Insurance Marketplace portal and will not be able to assist with Virginia consumer enrollments.

Q2. Could we get copies of the prior Town Hall documents?

Yes, we have included in the 4/21 FAQ email update. We will also make these available in a central location on our website in the coming days.

Q3. A previous FAQ indicated that EDE will not be included in Virginia for Plan Year 2024. Can SCC please clarify if both DE and EDE will not be included in PY 2024?

EDE and DE will not be included in Virginia for Plan Year 2024.

Q4. Will the Exchange change the PY 2024 User Fee given the release of the final Notice of Benefit and Payment Parameters?

The Virginia HBE is committed to providing superior service and customer support to Virginia consumers and stakeholders of Virginia's Insurance Marketplace. We are dedicated to achieving the purposes of our Exchange, including supporting the continuity of coverage and reducing the number of uninsured in Virginia. We are focused on performing all of this work in a fiscally prudent, strategic and cost-effective manner. For PY24, we plan to maintain the fee at 2.75% to facilitate additional resources during the continuous coverage unwinding, as well as the startup costs of Virginia's transition. Considering the recent announcement by Healthcare.gov of a further reduction to its User Fee, the Exchange is evaluating additional reductions in Virginia's assessment fee following our transition year. As part of this process, we strive to provide not only a higher quality of service and support, but also greater consistency and predictability in our service and in the cost to our carriers.

April 14, 2023

Q1. What will the user fee be for PY 2024?

For Plan Year 2024, the Exchange User Fee will be 2.75% of a carrier's total monthly premium from effectuated enrollment in QHPs and QDPs sold through Virginia's Insurance Marketplace. For Plan Year 2025, anticipating increased enrollment, the HBE proposes a user fee of 2.5%. User fees will continue to

be paid monthly and upon transition will be collected through the Exchange Platform. As in prior years, the Commission will issue an assessment order.

Should carriers have questions, please email to ExchangeCarriers@scc.virginia.gov.

Q2. Marketing Data: Will the commission be providing “language” that should be included in the customer facing letters?

No.

Q3. Do we need to submit the following items this year in our SERFF submissions?

- 1) Off Exchange binders
- 2) PlanandBenefitsLight
- 3) QHP Issuer Compliance Plan and Organizational Chart Cover Sheet Template
- 4) Partial County Service Area justification
- 5) Network Adequacy
- 6) Compliance with 12_VAC_5-408-160 E F 10207 and 40308
- 7) Virginia Certificate of Quality Assurance"

Yes, all of these will be submitted with the Binder filing. Carriers are encouraged to review the instructions in SERFF at <https://login.serff.com/serff/viewStatePlanInstructions.do?stateInstanceId=101> or contact the BOI Plan Management Section at ACAFilingInfo@scc.virginia.gov regarding Binder filings.

Q4. The preliminary NBPP has some ambiguity as far as how many non-standard plans will be allowed. Will there be flexibility in submissions/re-submissions to allow changes if the Final NBPP is different than a carrier had anticipated?

The initial transfer deadline of 6/14/2023 is the last day plans can be added to a binder. Plans may be withdrawn and service areas changed up until 7/14/2023. After 7/14/2023, plans may be withdrawn if the withdrawal does not cause a change in service area. Additional questions regarding plan filings may be sent to ACAFilingInfo@scc.virginia.gov.

Q5. Will the state provide a TTY number, if so when? This is a data element in our letters and we can proceed with our development without this information for now, but would request this be available prior to testing; or it be known that this will not be available so the data element can be removed.

Virginia will be using the National Relay of Service number of 711.

Q6. We believe the correct URL should be “https://marketplace.virginia.gov/”. Can you please confirm with the Exchange if “www” is needed there?”

The URL is marketplace.virginia.gov. Consumers will be re-directed to the marketplace website regardless of whether they use “www”.

Q7. Will the HBE provide a list of certified and de-certified agents prior to OEP? If so, will it include contact information beyond Name and NPN?

Agents who complete certification will appear in the Find Local Help tool on the platform. The Exchange would also be able to provide a list of certified agents to carriers prior to go-live.

Q8. "Follow-up question based on the information provided in the companion guide on Page 66, ""Section 11.13. Add Member - Different Plan"".

Is the same approach going to be followed for the scenario of Plan change without new member addition? i.e., if the consumer performs just a plan change, do we get one ST-SE with Termination for the previous plan and another ST-SE with Enrollment for the new plan? Or do we get one ST-SE with the new plan and a specific Benefit Begin Date in DTP*348?"

For a plan change when there is no dependent change, the 024 term would be in a separate ST/SE segment and contain the subscriber loop only. The 021 add would be in a separate ST/SE with loops for each enrollee (subscriber & dependents) and the DTP*348 coverage start date for the new Policy ID. This is the same transaction behavior that occurs if there is a plan change with a member change.

Q9. DTP*303 Date: The Companion Guide (page 24) says DTP*303 is used to specify "Maintenance Effective" date. Can you clarify the definition of this date?

DTP*303 is populated with the enrollment event creation date. In other words, this is the date the change was made in the system.

Q10. What is the schedule for 834 transmission, and do we get EDI 834 files from GetInsured over the weekend as well?

834 files are sent daily, including weekends and holidays. The 834s for the VA HBE will be sent nightly at 11:00 PM EST.

Q11. Effectuations: Are dependent segments required or optional?

The dependent segments are optional in the effectuation file (see VA HBE - 834 and Reconciliation Configurations). Effectuations will process successfully with or without these segments.

April 7, 2023

Q1. In the companion guide it says Configurable at the Exchange level to send for all transactions or not send is the 2000 loop REF01 = 4A Exchange Assigned Enrollee ID, which is used to provide a unique enrollee ID per coverage span during a given coverage year. Do you know what the assigned enrollee ID would look like? Is it just 4A coming in that field?

The 2000 loop REF01 = 4A Exchange-Assigned Enrollee ID will not be transmitted in the VA implementation.

March 30, 2023

Q1. Will the HBE provide a list of certified and de-certified agents prior to OEP?

If so, will it include contact information beyond Name and NPN? Agents who complete certification will appear in the Find Local Help tool on the platform. The Exchange would also be able to provide a list of certified agents to carriers prior to go-live.

Q2. Should carriers continue to follow the same renewal/non-renewal notice timelines?

75-day required notice for a passive renewal, 90-day notice for discontinuance non-renewal, 180-day notice for market exit? Note: Assume this is state law and will remain the same.

There will be no change to the renewal notice timeline.

Q3. FFE requires that in order to purchase standalone dental coverage, enrollees must have a purchased a medical plan. Will the Virginia State Based Exchange have that same requirement?

Virginia will allow consumers to purchase a standalone dental plan without the purchase of a medical plan.

Q4. Marketing Data: What is the URL and customer service number(s) for the exchange?

The URL will be <https://www.marketplace.virginia.gov/> and the consumer assistance number: 888-687-1501.

Q5. Can the commission provide information on monthly fees other than the assessment fee and re-insurance fee?

At this time, there is no plan for additional fees beyond the user fee assessment.

Q6. HIOS Rate Validation Tool: Can issuers continue to use the HIOS tools if they are not on the FFM?

Yes, HIOS tools remain available to carriers offering coverage in SBEs. Carriers should use the Plan Validation Workspace in the HIOS Marketplace Plan Management System prior to submission in the binder.

Q7. Will Townhall Meetings be recorded?

Generally, the Townhall meetings will not be recorded. The presentation will be provided with that week's FAQ email and will, in the future, be shared on the SCC's website.

Q8. 834 Companion: Individual Transactions: Separate files will be created for Individual enrollments to aid insurance Issuers in processing enrollment transactions. Can you clarify the intent of this section. Will we get one IEA/ISA per day? Will we get one family policy as single ST/SE?

Yes, we will be sending one ISA/IEA per date. Each ST/SE segment will contain a single enrollment in it.

Q9. Will the VA SBE allow for PCP Selection on the 834?

No, PCP selection is not included on the 834 file.

Q10. What will be the broker certification program/process requirements?

The VA Exchange will be offering state-based training and certification to agents, navigators, and assisters. A Virginia-specific learning management system will be available in summer 2023. FFE-certified agents who completed plan year 2023 registration and training will be eligible to complete a shorter training program for plan year 2024 along with Virginia-specific modules. Agents new to the Exchange or who are not currently FFE-certified will be required to take the full VA Exchange training program for plan year 2024. Agents will continue to be required to be licensed and in good standing through the Virginia Bureau of Insurance. Agents will be required to sign a Virginia-specific agent agreement. Updates to requirements will be published on the HBE's website and communicated in Monthly Townhalls and via emails.

Q11. What is VA planning for network adequacy?

We are currently using federal standards for the VA market, there is no change for the requirements for PY24. Guidance is available in the 2023 Letter to Carriers found at <https://www.scc.virginia.gov/getattachment/a64be606-a40b-4c12-a165-52924a1a406e/CarrierLetter-2024.pdf> as well as in the SERFF Plan Management Instructions.

Q12. What is VA's position on the 2024 NBPP proposals?

HBE will align with CMS guidance as provided in the PY 2024 final NBPP.

Q13. Are brokers required to be a resident to sell in VA?

No, brokers are not required to be a VA resident to sell in VA.

March 24, 2023

Q1. Will carriers continue to follow the current Federally Facilitated Exchange (FFE) Catastrophic age-off logic, and renew all on-exchange members on the policy into a mapped bronze plan for each of the scenarios listed below?

- Either the Subscriber or Spouse is already over age 30 before the current calendar year
- Subscriber is turning 30 during the current calendar year
- Spouse is turning 30 during the current calendar year, but the subscriber is still under 30

Yes, the Virginia HBE will follow the same catastrophic age-off logic as the FFE does for the scenarios listed.

Q2. Will Virginia State Based Exchange follow the FFE Open Enrollment Dates and effective date rules?

- Open Enrollment dates 11/1 through 1/15
- For coverage effective 1/1 must enroll by 12/15
- For coverage effective 2/1 must enroll by 1/15,

Yes, the Virginia HBE will follow the same Open Enrollment Dates as the FFE. Open Enrollment will run from 11/1 through 1/15. For coverage effective 1/1, consumers must enroll by 12/15. For coverage effective 2/1, consumers must enroll by 1/15.

Q3. Will the Virginia State Based Exchange be sending by mail the notice to subscribers that provides them with their updated APTC amounts for the upcoming plan year or will Carriers need to send that notice? Note: We do not currently send any APTC verification in State Based Exchange (SBE) states.

No, carriers are not required to provide a notice with a consumer's updated APTC amounts for the upcoming plan year. The Virginia HBE will send the Renewal Notice that will include information on their APTC eligibility.

Q4. Loop 2000, DTP*356 (Eligibility Begin Date): In what scenarios is the 356-date transmitted?

The 356 date is not sent for any outbound transaction to the carriers. This date is optional on inbound transactions. If this is included on an inbound transaction to Exchange transaction, this will process successfully (not reject).

Q5. Can we generate reinstatements for VASBE, can we generate cancel/term for anything other than non-payment?

No, carriers cannot generate cancel/terms for any reason other than non-payment. Carriers cannot send 834 reinstatements.

Q6. Can the commission provide information on re-insurance fee (s) (if there is one to be accrued for)?

The state share of funding for Virginia's Commonwealth Health Reinsurance Program (CHRP) is provided from state general fund revenue and not from a carrier assessment.

Q7. What is the official cutover date for plan shopping and enrollment, i.e., when will healthcare.gov customers be directed to the VA marketplace to search for and apply for coverage?

Healthcare.gov will direct consumers to the Virginia Marketplace ahead of the 11/1 Open Enrollment period. Virginia is working closely with CMS to align the dates when the messaging on healthcare.gov will begin directing consumers to the VA HBE platform, and we will share this information when this is available.

Q8. Will there be an interim period when customers can shop/apply on both healthcare.gov and VAHBE?

Customers will always use healthcare.gov to shop/apply for 2023 coverage and will use the HBE Platform to shop/apply for 2024 coverage. There will never be an overlap period where they can shop for both plan years on one platform. On November 1, consumers will be able to update their accounts, apply, and enroll in coverage on the HBE Platform. The Exchange intends to have a soft launch in October prior to OE where consumers will be able to view plans available, and we are coordinating these dates with CMS.

Q9. On what date will CMS confirm the go/no go decision for officially transitioning to the VA marketplace?

The VA Exchange and CCIIO will mutually agree on the Exchange's readiness to transition to a SBE for the upcoming open enrollment on August 4th.

Q10. Additionally, can you confirm that the new platform will show both PY2023 and PY2024 plans when it launches?

Plan year 2024 plans will appear on the Exchange Platform. Plan Year 2023 plans will not appear on the Exchange platform. Consumers can continue to view their previous year's plan data on healthcare.gov.

Q11. HIOS Rate Validation Tool: Can issuers continue to use the HIOS tools if they are not on the FFM?

Yes, HIOS tools remain available to carriers offering coverage in SBEs. Carriers should use the Plan Validation Workspace in the HIOS Marketplace Plan Management System prior to submission in the binder.

Q12. Will Townhall Meetings be recorded?

Generally, the Townhall meetings will not be recorded. The presentation will be provided with that week's FAQ email and will, in the future, be shared on the SCC's website.

Q13. In the ACT01 it says will transmit the brokers NPN or State license number (Companion Guide Page 22). Which one will it be and is it possible either data element would be sent?

For Virginia, the ACT01 will include broker NPN. It will not include the state license number.

March 17, 2023

Q1. Which entity will issue the Marketplace Open Enrollment Notice (MOEN) to all qualified individuals currently enrolled in QHPs/QDPs through the FFE in advance of the OEP for PY2024 coverage?

HBE will issue the Marketplace open enrollment notice.

Q2. Where will enrollees report changes affecting eligibility before and after 11/1?

Consumers will report changes on healthcare.gov for 2023 coverage and will report changes on the HBE platform for 2024 changes.

Q3. Will the FFM or VAHBE perform Batch Auto-Reenrollment (BAR)?

The HBE platform will perform the batch auto re-enrollment process based on data from the FFM. The 834 renewal files will come from the HBE, not the FFM.

Q4. Will the FFM or VAHBE handle alternate enrollments where no QHP from the same issuer is available for PY2024?

The Exchange will be performing the crosswalk of consumers in the cases where the same issuer is not available in that area.

Q5. Will Virginia have state subsidy in addition to APTC?

No state subsidy is planned for Plan Year 2024.

Q6. What is the Subscriber ID format?

The Exchange Assigned Member IDs will be assigned by GetInsured system. The field length is 10 positions, all numeric, and will start with "1000000001".

Q7. Will VA be assigning different subscriber IDs for medical vs dental subscribers?

No, the Exchange Assigned Member ID is established at the person-level and will be the same for consumers enrolling in health and dental plans.

Q8. Proration: Can the APTC on the 834 be prorated when the total quoted premium is prorated?

APTC will not be prorated on the 834 but APTC will be capped on the 834 if it exceeds the premium subtotal.

Q9. Dental APTC: Will Virginia State Based Exchange allow additional APTC to be applied to dental plans as is done today under FFE? i.e. If the APTC exceeds the medical gross premium, can it be applied to dental?

Yes, the HBE will allow excess APTC to be applied to pediatric dental premiums.

Q10. Will we be doing passive (auto) renewals?

Yes. Passive renewals will be transmitted by HBE (not by the FFE).

Q11. Enhanced Direct Enrollment: What will this process be for 2024? What are the timeline implications if VA proceeds with EDE for Plan Year 2024.

EDE will not be included for Plan Year 2024.

Q12. Will Member IDs and Household Case ID on renewal transactions be generated new for the first year and be maintained going forward from year two?

Yes, Exchange Assigned Member IDs and Household IDs will be generated new in the HBE platform (these will not be the FFE values). These will be maintained for future plan years.

Q13. What is a Household Case ID?

The Household Case ID is the ID assigned to all members of a household in the same application. This ID is included in all transactions initiated by the Exchange. In the case of custom grouping enrollments (multiple health enrollments in the same household), this ID will be the same for each enrollment.

March 10, 2023

Q1. Will Virginia require carriers to offer Standard Plans for every metal level?

HBE will align with CMS guidance as provided in the PY 2024 final NBPP.

Q2. What will be the Plan Management filing deadlines, and will these match the FFE?

HBE plans to follow the plan management filing deadlines generally through early August. Updates to the plan management timeline are expected from BOI in late March. Visit <https://www.scc.virginia.gov/pages/ACA-Rate-Form-Filing-Information> for updates and instructions.

Q3. When will the state provide communication/marketing information?

The name will be released at the March 28th Advisory Committee meeting (2 pm). We are working to identify appropriate timelines for additional marketing information. We are aiming to ensure carriers have information in time for development of materials while avoiding consumer confusion around ongoing PY2023 coverage and enrollment through healthcare.gov. The Advisory Committee meeting link will be found here: <https://www.scc.virginia.gov/pages/Webcasting>.

Q4. When will the official name of the Exchange and the URL for member enrollment be available?

The name will be released at the March 28th Advisory Committee meeting (2 pm). We are working to identify appropriate timelines for additional marketing information. We are aiming to ensure carriers have information in time for development of materials while avoiding consumer confusion around ongoing PY2023 coverage and enrollment through healthcare.gov. The Advisory Committee meeting link will be found here: <https://www.scc.virginia.gov/pages/Webcasting>.

Q5. What will the user fee percentage be?

This will be available in early April.

Q6. When will the state provide communication/marketing information? This includes sample SBCs, sample carrier invoice templates, and the Virginia logos.

The name will be released at the March 28th Advisory Committee meeting (2 pm). We are working to identify appropriate timelines for additional marketing information. We are aiming to ensure carriers have information in time for development of materials while avoiding consumer confusion around ongoing PY2023 coverage and enrollment through healthcare.gov. The Advisory Committee meeting link will be found here: <https://www.scc.virginia.gov/pages/Webcasting>.

Q7. Marketing data: Will the official name of the exchange and the URL for member enrollment be available by Mar 15?

The name will be released at the March 28th Advisory Committee meeting (2 pm). We are working to identify appropriate timelines for additional marketing information. We are aiming to ensure carriers have information in time for development of materials while avoiding consumer confusion around ongoing PY2023 coverage and enrollment through healthcare.gov. The Advisory Committee meeting link will be found here: <https://www.scc.virginia.gov/pages/Webcasting>.

Q8. Will the commission be providing any preferred language for the consumer facing materials (i.e., new exchange does not use healthcare.gov, etc.) if so, will this also be available by Mar 15?

Not at this time.

Q9. What Name, URLs, and phone numbers should carriers use in their communications to direct customers on behalf of the Virginia State Based Exchange?

The name will be released at the March 28th Advisory Committee meeting (2 pm). We are working to identify appropriate timelines for additional marketing information. We are aiming to ensure carriers have information in time for development of materials while avoiding consumer confusion around ongoing PY2023 coverage and enrollment through healthcare.gov. The Advisory Committee meeting link will be found here: <https://www.scc.virginia.gov/pages/Webcasting>.

Q10. What transition notices or other advertising will FFE, and the Virginia State Based Exchange be sending to customers about the transition and when? Will Carriers be able to see a communications timeline and samples?

The FFE will be providing notices in August/September. HBE will be following those communications with notices shortly after. HBE will provide a communications timeline and sample as soon as it becomes available.

March 1, 2023

Q1. Will the enrollee-level carrier payment data submission be mandatory on Day 1 of go-live?

As noted in the 2/22 February Update, this will not be implemented for plan year 2024. The Exchange will evaluate for future years.

Q2. Is PayNow functionality mandatory for all carriers on Day 1 of go-live?

Carriers who implement on day one has an advantage of quick effectuations but there is no operational impact on configuring this later. Consumers can make binder payments regardless of this feature. PayNow implementation among carriers is independent from each other (i.e., if some carriers choose not to implement this, there would not be an impact on others). GetInsured can provide additional carrier support if more time is necessary to configure.

Q3. When will the state provide communication/marketing information?

The Exchange is working on this issue and will provide an update over the next several weeks.

Q4. When will the official name of the Exchange and the URL for member enrollment be available?

This is currently in progress and the Exchange will provide this information as soon as possible.

Q5. What will the user fee percentage be?

This information will be available in early April.

Q6. Will there be a monthly all-carrier call to discuss onboarding progress?

Yes. The first monthly Town Hall has been scheduled for 3/22, from 11:00am-12:00pm. An ongoing schedule for monthly meetings will also be established and calendar invitations sent out shortly.

Q7. What is the process for communicating carrier questions back to carriers?

Questions will be answered in FAQs in regular email communications and in monthly Town Hall meetings. The Exchange is working to develop a central location for carriers to view and refer to this information.

Q8. Will Virginia require carriers to offer Standard Plans for every metal level?

Virginia will align with the FFE for plan year 2024 based on the final Notice of Benefit and Payment Parameters.

Q9. What will be the Plan Management filing deadlines, and will these match the FFE?

Virginia will be matching the FFE, and we are waiting for dates to be finalized.